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14	UNITED STATES	DISTRICT COURT
15	NORTHERN DISTRICT OF CAL	LIFORNIA, SAN JOSE DIVISION
16	CHASOM DROWN at all on babalf of	Case No. 4:20-cv-03664-YGR-SVK
17	CHASOM BROWN, et al., on behalf of themselves and all others similarly situated,	Case No. 4.20-67-03004-1 GR-57K
	•	DECLARATION OF TRACY GAO IN
18	Plaintiffs,	SUPPORT OF GOOGLE'S
19	Vs.	ADMINISTRATIVE MOTION TO SEAL PORTIONS OF THE FEBRUARY 14,
17	vs.	2023 HEARING TRANSCRIPT (DKT.
20	GOOGLE LLC,	870)
21	Defendant.	Referral: Hon. Susan van Keulen, USMJ
22	PATRICK CALHOUN, et al., on behalf of	Case No. 4:20-cv-05146-YGR-SVK
22	themselves and all others similarly situated,	DECLARATION OF TRACK CAO IN
23	Plaintiffs,	DECLARATION OF TRACY GAO IN SUPPORT OF GOOGLE'S
24	riamums,	ADMINISTRATIVE MOTION TO SEAL
	vs.	PORTIONS OF THE FEBRUARY 14,
25	COOCLETIC	2023 HEARING TRANSCRIPT (DKT.
26	GOOGLE LLC,	985)
	Defendant.	Referral: Hon. Susan van Keulen, USMJ
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Case No. 4:20-cv-03664-YGR-SVK

I, Tracy Gao, declare as follows:

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- 1. I am a member of the bar of the State of California and an attorney with Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC ("Google") in both the *Brown* case and the *Calhoun* case. I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.
- 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of Google LLC's Administrative Motion to Seal Portions of the February 14, 2023 Hearing Transcript in both cases (*Brown* Dkt. No. 870; *Calhoun* Dkt. No. 985) ("Transcript"). In making this request, Google has carefully considered the relevant legal standard and policy considerations outlined in Civil Local Rule 79-5. Google makes this request with the good faith belief that the information sought to be sealed consists of Google's confidential and proprietary information and that public disclosure could cause competitive harm.
- 3. I have reviewed the document to be filed under seal pursuant to Civil Local Rule 79-5. Based on my review, there is good cause to seal the following information:

Document(s) to be Sealed		
Transcript of the February 14, 2023 Preservation		
Hearing		
-		
Pages 4:12-13, 6:22, 6:24-25, 7:25, 8:1-2, 9:10-11,		
9:15-16, 9:18, 9:21-22, 9:25, 10:4, 10:6, 10:12-15,		
10:17, 10:19-20, 10:24, 11:3-4, 11:6, 11:16, 11:19,		
12:1, 12:4, 12:7, 12:9-10, 12:14, 12:19, 12:21,		
12:24, 13:4, 13:16, 13:25, 14:6-7, 14:10-13, 14:17,		
14:21, 14:24-25, 15:7, 15:17, 15:21, 16:4-5, 16:11,		
16:13, 16:25, 17:1, 17:3, 17:7, 17:11, 17:15, 17:21,		
17:25, 18:11, 18:13, 18:24-25, 19:1, 19:3, 20:20,		
22:9, 23:10, 23:15, 23:17-18, 23:20, 24:11, 24:13,		
24:16, 24:18-20, 25:14, 25:18, 25:25, 26:6, 26:9,		
26:16, 27:1-2, 27:4, 27:6, 27:8, 27:15, 27:17, 28:1-		
2, 28:4, 28:9-10, 28:14, 29:3, 29:7, 29:17, 30:12,		
30:19-20, 30:25, 31:1, 31:4, 31:9, 31:15, 32:2, 33:1,		
33:4, 33:18, 33:20, 34:15, 34:18-19, 34:21, 37:24,		
38:7, 38:9-10, 38:12, 38:19, 38:22, 39:1, 39:4-5,		
39:15-16, 40:14, 42:11-12, 42:14-15, 43:8, 43:14,		
44:8, 44:11, 44:19, 45:4, 45:9-10, 45:13, 45:15,		
45:17-18, 45:22, 46:10, 46:17, 46:22-23, 47:5, 47:7,		
47:11, 47:14, 47:17-18, 47:23, 48:21, 49:1, 49:8-9,		
49:12-13, 49:17, 51:6, 51:11, 52:3		

**Basis for Sealing** The information requested to be sealed contains non-public, sensitive confidential business information related to Google's internal technological systems that could affect Google's competitive standing and may expose Google to increased security risks if publicly disclosed, including various types of Google's internal projects, internal data sources, and their proprietary functionalities, which Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's Such competitors. confidential information reveals Google's internal systems and operations. Public disclosure of such confidential information could affect Google's competitive standing as competitors may alter their system designs and practices relating to competing products, time strategic litigation, or otherwise unfairly compete with Google.

> Case No. 4:20-cv-03664-YGR-SVK Case No. 4:20-cv-05146-YGR-SVK

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2	4. Google's request is narrowly tailored in order to protect its confidential information	
3	These redactions are limited in scope and volume. Because the proposed redactions are narrowless.	
4	tailored and limited to portions containing Google's highly-confidential, or confidentia	
5	information, Google requests that the portions of the aforementioned documents be redacted from	
6	any public version of those documents.	
7	5. Google does not seek to redact or file under seal any of the remaining portions o	
8	documents not indicated in the table above.	
9	6. For the reasons discussed in the Motion, Google respectfully requests that the Cour	
10	order the identified portions of the Transcript to be sealed.	
11	I declare under penalty of perjury of the laws of the United States that the foregoing is tru	
12	and correct. Executed in Washington D.C. on February 23, 2023.	
13		
14	DATED: February 23, 2023 QUINN EMANUEL URQUHART & SULLIVAN, LLP	
15		
16	Dv. / / T C.	
17	By /s/ Tracy Gao Xi ("Tracy") Gao	
18	Attorney for Defendant	
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28	Case No. 4:20-cv-03664-YGR-SV	
	2 Case No. 4:20-cv-05004-1 GR-SV	